

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MIGUEL MALDONADO,)	
)	08 C 1954
Plaintiff,)	
)	
vs.)	Judge Aspen
)	
CITY OF CHICAGO, et al.,)	
)	Magistrate Judge Nolan
Defendants.)	

AGREED INITIAL DISCOVERY PLAN

Plaintiff Miguel Maldonado, by and through his attorney Leslie McCoy, and Defendant City of Chicago, by its attorney Mara S. Georges, Corporation Counsel for the City of Chicago, submit the following agreed, initial discovery plan:

A. Present Status

Plaintiff filed his complaint on April 4, 2008. The City filed its appearance on May 8, 2008 and its answer on June 9, 2008. The City has made numerous requests for documents and other information indicating any encounter between Plaintiff and members of the Chicago Police Department on January 24, 2008. Counsel for the City finally received information responsive to this request on July 29, 2008 and will produce this to Plaintiff forthwith.

B. Proposed Discovery Plan

Once the officers are identified, Plaintiff will file his amended complaint, and as soon as the named Defendants have answered the amended compliant, the parties will file an amended Discovery plan with the court.

Respectfully submitted,

MARA S. GEORGES
Corporation Counsel of the City of Chicago

/s/ Leslie McCoy
Leslie McCoy
Counsel for Plaintiff Maldanado

By: /s/ Megan K. McGrath
Megan K. McGrath
Assistant Corporation Counsel